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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

JEREMY JOHNSON, *et al.*,

Defendants.

Case No. 2:10-cv-02203-MMD-GWF

FTC'S MOTION FOR LEAVE TO  
FILE IWORKS' WHITE PAPER  
UNDER TEMPORARY SEAL

1 Earlier today, the FTC filed its opposition [D.E. 1708] to Defendant Jeremy Johnson's  
 2 Motion for Protective Order [D.E. 1704] and the concurrent motions of defendant Ryan Riddle  
 3 and settled defendant Bryce Payne. Defendants seek to prevent the Federal Trade Commission  
 4 ("FTC") from disclosing "confidential" materials contained in a "white paper" they submitted to  
 5 the FTC in 2010 (the "iWorks White Paper"). The FTC opposes the motions for protective order  
 6 because the materials in question are no longer confidential, if they ever deserved that  
 7 designation, and the presumption of public access requires that they be part of the public record  
 8 in the event they are used as evidence at trial. Since it is impossible for the Court to evaluate the  
 9 merits of the motions without reviewing the iWorks White Paper, the FTC seeks leave to file it  
 10 under a temporary seal.  
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12 For all the foregoing reasons, the Court should grant the FTC's motion and allow it to file  
 13 the iWorks White Paper under a temporary seal.  
 14

15 Respectfully submitted on November 18, 2015,

16 /s/ Roberto Anguizola

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FTC's Motion for Leave to File IWorks'  
 White Paper Under Temporary Seal

**CERTIFICATE OF SERVICE**

I hereby certify that I have on November 18, 2015 caused the foregoing document to be served on the following via the ECF system:

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*Duane Fielding, Anthon Holdings Corp., and Network Agenda LLC, and for*

*Relief Defendants Sharla Johnson, Barbara Johnson, Kerry Johnson, The KB Family Limited Partnership, KV Electric Inc.,*

FTC's Motion for Leave to File IWorks'  
White Paper Under Temporary Seal

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11 *CS Processing, Inc., GGL Rewards, Inc., Highlight Marketing,*  
12 *Inc., Mist Marketing, Inc., Net Discounts, Inc., Optimum*  
13 *Assistance, Inc., Razor Processing, Inc., and Simcor Marketing,*  
14 *Inc.; Duane Fielding, Anthon Holdings Corp., and Network*  
15 *Agenda LLC; and Andy Johnson*

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FTC's Motion for Leave to File IWorks'  
White Paper Under Temporary Seal

1 And via email and Federal Express on November 18, 2015, to the following pro se  
2 defendants:

3 Loyd Johnston  
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Santa Clara, UT 84765

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6 Ryan Riddle  
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8  
9 /s/ Roberto Anguizola  
Roberto Anguizola

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26 FTC's Motion for Leave to File IWorks'  
White Paper Under Temporary Seal

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

JEREMY JOHNSON, *et al.*,

Defendants.

Case No. 2:10-cv-02203-MMD-GWF

~~[Proposed]~~ ORDER GRANTING  
FTC'S MOTION FOR LEAVE TO  
FILE IWORKS WHITE PAPER  
UNDER TEMPORARY SEAL

Plaintiff Federal Trade Commission has applied for an Order allowing it to file a “white paper” defendants submitted to the FTC in 2010 (the “iWorks White Paper”) containing allegedly confidential material under a temporary seal pending a decision on defendant Jeremy Johnson’s Motion for Protective Order [D.E. 1704] and the concurrent motions of defendant Ryan Riddle and settled defendant Bryce Payne.

Having considered the FTC’s motion, any opposition, and being duly advised,  
**IT IS HEREBY ORDERED THAT** the FTC is permitted to file the iWorks White Paper, its appendices, and the cover letter containing allegedly confidential material under a temporary seal that will remain in place pending a decision on defendant Jeremy Johnson’s Motion for Protective Order [D.E. 1704] and the concurrent motions of defendant Ryan Riddle and settled defendant Bryce Payne.

**IT IS SO ORDERED**

Dated: December 4, 2015

  
GEORGE FOLEY JR.  
United States Magistrate Judge